

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No.: 21-1-LPS
	:	
SAMUEL GULICK,	:	
	:	
Defendant.	:	

DEFENDANT’S UNOPPOSED MOTION TO CONTINUE
THE SENTENCING HEARING

Defendant, Samuel Gulick, through undersigned counsel, Conor Wilson, Assistant Federal Public Defender for the District of Delaware, hereby moves this Court for an Order continuing the sentencing hearing in this case. In support of this motion, Mr. Gulick avers as follows:

1. The Court scheduled Mr. Gulick’s sentencing hearing for January 26, 2022, at 12:30 p.m.
2. Mr. Gulick is incarcerated at the Federal Detention Center (“FDC”) in Philadelphia, PA.
3. The parties have met and conferred regarding their sentencing recommendations and believe that the possibility of a joint recommendation exists. However, the parties need additional time to investigate and refine the recommendation(s).
4. Counsel respectfully requests that the Court continue Mr. Gulick’s sentencing hearing in this matter for a period of forty-five (45) days to permit an appropriate amount of time for the parties to complete this work.
5. Shawn Weede, Chief of the Criminal Division in the United States Attorney’s

Office, and Ruth Mandelbaum, Assistant United States Attorney, informed counsel that the government does not oppose this motion.

WHEREFORE, for the above stated reasons, and any other such reasons that shall appear to the Court, Mr. Gulick respectfully requests that the Sentencing Hearing be continued to a date after March 14, 2022.

Respectfully Submitted,

ELENI KOUSOULIS
Federal Public Defender

By: /s/ Conor Wilson
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